



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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October 23, 2013

David P. Senkel
City Attorney, Crystal City
Thurman Law Firm
301 Main Street
Hillsboro, MO 63050

Dear Mr. Senkel:

Thank you for your letter of October 1, 2013 written on behalf of Crystal City providing comments on the Interior Dust Cleaning Work Plan for Residential Area Near the Shapiro Brother's Festus Site prepared by AMEC Environment and Infrastructure, Inc. I have included each of your comments and provided responses individually below.

1. *The Work Plan indicates that the target residential parcels are only those parcels in which SU2 concentrations exceeded 400 mg/kg lead. The Work Plan should be amended to specifically indicate that target parcels also include properties where total yard concentrations exceeded 400 mg/kg lead.*

The intention was always to offer cleanups to all property owners with any portion of their yard containing lead over 400 mg/kg (SU1, SU2 or the entire yard), and our previous correspondence to the homeowners has reflected that. The Work Plan will be amended to clarify this intent.

2. *The Work Plan does not address the cleaning of heating, air conditioning and ventilation (HVAC) systems or ductwork and air vents/grilles in the homes. The accumulation of dust in horizontal runs of ductwork as well as on interior components of HVAC systems may be as prevalent as the dust on the surfaces proposed for cleaning throughout the home. The Work Plan should be amended to include HVAC, ductwork and air vent/grille cleaning so that entrenched lead dust accumulated in these systems and components does not become re-introduced into interior areas of the homes following remediation. The Work Plan should be amended to include a protocol which defines the process by which these components will be cleaned. Additionally, following this cleaning process, air filters in the HVAC systems shall be carefully removed, bagged, disposed of and replaced.*

The Work Plan was written to be consistent with the guidelines set forth in the U.S. Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Chapter 14, Section III and IV, and Chapter 11, section V, Part B.2 and B.3.

Those guidelines specify cleaning on a number of surfaces including heating, ventilation, and air conditioning vent covers (including cold air return vent covers). Language has been added to the Work Plan to clarify that these surfaces will be addressed. A fact sheet will be prepared by AMEC and provided to each homeowner prior to the interior dust cleanup work which will include a recommendation that they replace their HVAC filters immediately after completion of the cleanup.

3. *Section 3.1.4.1 of the Work Plan indicated that blinds or shutters and similar window coverings will be excluded from the wet wiping cleaning activities. The Work Plan should be amended to include these surfaces in the wet cleaning activities, or if they are not hard surfaces, in the HEPA vacuuming activities.*

The Department and MW Recycling LLC agree that cleaning of blinds, drapes or similar window coverings should be included as part of the indoor dust cleanup. The Work Plan will be amended accordingly.

4. *The Work Plan does not include a specific cleaning protocol for area rugs, carpets, draperies, curtains and upholstered furniture. The Work Plan should be amended to include such a protocol to define the process by which these components will be agitated and the rate at which HEPA vacuuming shall be conducted on these surfaces.*

The Work Plan will be amended to further describe the HEPA vacuuming protocols specified in the HUD guidelines referenced in our response to Comment #2 above.

5. *The Work Plan states that interior dust cleaning will be conducted only after exterior soil remediation has been completed. The Work Plan should be amended to demark a buffer area between exterior soil remediation activities and interior dust cleaning activities.*

The removal of the impacted soil and the placement of the sod will occur prior to the initiation of interior dust cleaning activities. MW Recycling or its consultant will not initiate interior work activities until several weeks after soil/sod work has been completed in the area and weather conditions are conducive to the commencement of interior work, dependent on site conditions.

6. *Section 3.1.6 of the Work Plan cites an environmental professional who will be collecting the clearance samples. The Work Plan should be amended to indicate that the individual collecting the clearance samples should be a Missouri-licensed lead inspector or risk assessor. Further, in accordance with Chapter 15 of the HUD Guidance, the clearance sampling should be conducted by an independent third party not associated with the indoor remedial activities. Additionally, the analyses of these samples should be conducted by a third party National Lead Laboratory Accreditation Program (NLLAP) laboratory.*

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The Department agrees than an independent third party should conduct the clearance sampling and the Work Plan will be amended accordingly.

7. *The header of the Work Plan indicates the location of this project is Collinsville, Oklahoma. Additionally, the document header indicates a Shaw project number and the date of December 2012. This erroneous and possible remnant information should be corrected.*

The Work Plan was drafted based on a similar project in Oklahoma and some of the text from the Oklahoma Work Plan was inadvertently carried over. The Work Plan will be corrected to remove this text.

8. *The header of the Work Plan indicates the location of this project is Collinsville, Oklahoma. Additionally, the document header indicates a Shaw project number and the date of December 2012. This erroneous and possible remnant information should be corrected.*

Please see the response to comment #7. The Work Plan will be corrected as noted.

If you have any questions regarding the results of this investigation, please contact me by email at dennis.stinson@dnr.mo.gov, or by phone (573) 751-4187 or (800) 361-4827.

Sincerely,

HAZARDOUS WASTE PROGRAM



Dennis Stinson, Chief
Superfund Section

DS:msj

c: The Honorable Thomas V. Schilly
Mayor, City of Crystal City, Missouri

Mr. Jason Eisenbeis,
City Administrator, City of Crystal City, Missouri

